



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I  
JOHN F. KENNEDY FEDERAL BUILDING  
BOSTON, MASSACHUSETTS 02203-0001

November 14, 1996

Mr. Philip Otis  
U.S. Department of the Navy/Northern Division - NAVFAC  
10 Industrial Highway  
Code 1811/PO - Mail Stop 82  
Lester, PA 19113-2090

Re: Final Work Plan & Response to Comments for Site 10 Debris Removal, Building 111  
Removal of Lead Dust, Calf Pasture Point Munitions Bunker Lead Clean up, Removal of Lead  
contaminated Soils, at the former Naval Construction Battalion Center Davisville, Rhode Island,  
Dated October 25, 1996

Dear Mr. Otis:

Pursuant to § 12.5 of the NCBC Federal Facility Agreement (FFA), the Environmental  
Protection Agency's (EPA) has reviewed the above referenced documents.

The Navy lead in soil sampling methodology treats each building as a separate site under State  
Regulations and the samples the surrounding sides with one (1) resulting composite sample. At  
NCBC IR Sites 5, 8, 6 & 10 an average lead value obtained by averaging a number of discreet  
samples at each site have been allowed under State regulations. If the Navy and the State of  
Rhode Island wish to consider each separate building as a separate site under State Regulations,  
EPA would concur at this NPL site only.

The Navy must ensure these proposed actions will adequately mitigate or eliminate the threats  
posed by the sites and will be conducted in a manner consistent with State and federal regulations.  
Should the Navy, in consultation with EPA and RIDEM, determine that additional remedial action  
is required at the sites, the Navy must transition from removal to remedial response activities.

If you have any questions with regard to this letter, please contact me at (617) 573-5736.

Sincerely,

A handwritten signature in cursive script, appearing to read "Christine Williams".

Christine A.P. Williams  
Remedial Project Manager  
Federal Facilities Superfund Section

Enclosure



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cc: Christi Davis, Northdiv  
Richard Gottlieb, RIDEM  
Walter Davis, CSO  
Andy Beliveau, EPA  
George Horvat, Dynamac  
Marilyn Cohen, ToNK  
Howard Cohen, RIEDC  
Bryan Wolfenden, RI RC&D  
Marjory Myers, Naragansett Indian Tribe

## Annotated Responses to EPA Review Comments:

1. In general, Navy responses to EPA comments, either in the form of revised text, the inclusion of additional text or appendices, or providing clarification in their responses appear to satisfactorily address the majority of EPA comments. However, upon review, several concerns still remain; they include:

- Confirmatory lead soil sampling plan - this plan is designed to confirm the lead levels in a vertical direction (at depth) and not in a horizontal direction (surface soils). Additionally, the plan relies on the use of composite samples which may potentially leave lead contamination along a side of a building in excess of regulatory removal criteria. (This issue is further detailed in the specific comments section that follows).
- In Section 4.7 of the report, it is indicated that the demolition of the 42 buildings on the NCBC Davisville facility will include asbestos abatement. No other information is provided in the report concerning asbestos abatement including expected volume of asbestos containing waste to be generated (Table 5-1), frequency and methods of sampling (Tables 6-1 and 6-2), disposal and transportation concerns (Table 5-2). The report should be modified to include or a reference made to a more detailed discussion regarding the planned asbestos abatement.

2. Several places in the responses indicate that when criteria are not achieved that the Navy will obtain concurrence for action with the BRAC Team. The deliverable requirements of the submittal from the Navy must be defined. It is recommended that a report be provided which at a minimum contains a discussion of the criteria and provide what was not achieved with data to support the decision and the Navy proposed action.

## SPECIFIC COMMENTS

3. Comment #1: The validation criteria for analytical data were not addressed in the bulleted response or the additions to Section 6.

4. Comment #4: The comment requests that consistent units of measure be utilized throughout the document. While many of the inconsistencies between units have been addressed, inconsistencies between units still persists. For example, on page 3-1 the report utilizes the unit of measure (mg/l) while in other areas of the report the unit of measure (mg/L) is used. Further review of the text should be performed to ensure that issues regarding unit of measure consistency are fully addressed.

5. Comment #14: This comment suggested the possible use of x-ray fluorescence as a quicker means of obtaining data. The response cites the limited number of samples as justification for not

utilizing x-ray fluorescence. This approach should be reevaluated based on technical review of response to EPA Comment 40.

6. Comment #15: This comment requests that regulatory references to cleanup criteria cited in Table 2-1 be included. Although the regulatory reference is cited in the beginning of the report and in the Navy response to comments, footnotes should be included in Table 2-1 also citing the regulatory reference for clarity.

7. Comment #16: It is recommended that the bulleted items including the development of a SAP, the validation of confirmatory analytical data, and the assessment of analytical data in the original comment be included in Table 2-2. They are integral to the project activities.

8. Comment #23: Define how materials are discovered to be suspect hazards visually.

9. Comment #25: It is recommended that the compatibility of the Ledizolv with the other wastes generated from decontamination be evaluated. The comment requested that the composition of the product Ledizolv be provided. The response indicates that an MSDS for Ledizolv would be included as an appendix. It appears that the MSDS has not been included in the report.

10. Comment #28: The comment requests that the Barnes and Jarnis Sampling Plan be submitted for EPA for review. The Navy indicates a copy of the plan will be submitted to EPA. EPA has not yet received this document.

11. Comment #35: The comment requests clarification on a number of QA/QC issues. The response incorrectly cites Section 6.5 for clarification, when it appears that Section 6.4 is the section intended. Additionally, the text provided in Section 6.4.1 (Field Duplicate Samples) is confusing. The report indicates that one Field duplicate will be collected for every 10 samples of a similar matrix. However the last sentence of this paragraph indicates that the field duplicates are to be split and used as the laboratory duplicates at a frequency of 1 every 20 samples. The relationship between field duplicates and laboratory duplicates and (MS/MSD) samples should be clarified to include the frequency of collection of these samples. The report indicates that field duplicates will be split by the laboratory and used as laboratory duplicates or MS/MSD samples. This statement appears to indicate that the laboratory knows which samples are considered field duplicates.. This is not appropriate, since as stated in Section 6.4.1 field duplicates are to be considered "blind" samples to the laboratory. Clarification of this issue should be provided.

12. Comment #38: The comment requests a plan of action should the confirmatory soil samples exceed the cleanup criteria. The response indicates that results will be presented to the Navy and BRAC Cleanup Team for further direction. According to the work plan, commencement of field work is projected to occur during late CY 96 at a time when weather conditions may significantly impact work schedule and performance. It is recommended that plans of action based on various possible analytical results be submitted and agreed upon by the Navy and BRAC Cleanup Team prior to work proceeding in order to eliminate down time associated with the work effort after the work has commenced.

13. Comment #40: The comment requested figures of proposed confirmatory sampling locations. The response indicates confirmatory soil sampling will consist of one composite sample per building consisting of four aliquots collected from each side of a building from the bottom of the excavation. These samples are then to be analyzed total lead. Because sides of buildings experience different levels of weathering (wind, sun, and moisture), and exposure to varying levels of activity, it seems inappropriate to composite samples from four sides, thereby potentially diluting a sample where the levels exceed cleanup standards. Additionally, confirmatory sampling, as stated, appears to be focusing on confirming contamination levels in a vertical direction (samples to be collected at the bottom of the excavation) with no effort to confirm contamination in the horizontal direction. Individual confirmation samples should be collected from each side of the building from the bottom of each excavated area. These samples may be composite samples consisting of aliquots collected from the same side of the building. Likewise, confirmation surface soil sampling immediately next to the excavated areas should be performed to verify that lead contamination has not spread horizontally from the building. This EPA preferred sampling scheme may not be consistent with State regulations and the methodology used in other sites here at NCBC where an average of samples per site have been allowed under State regulations. If the Navy and the State of Rhode Island wish to consider each separate building as a separate site under State Regulations, EPA would concur at this NPL site only.

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14. Table 6-1 It is recommended that a digestion procedure be referenced with the analysis procedure Method 6010.

15. Provide discussion regarding the rationale for no field duplicates for the Waste Disposal Characterization and Backfill Material Sampling:

16. Section 6.2 Data Quality Objectives It is recommended that a digestion method be included with the analysis Method 6010 in the NET QA Plan. This will ensure that SW-846 is adhered to strictly.

17. Section 6.3.2 Confirmatory Soil Sampling The number of samples described in this section does not correlate with the number of samples in Table 6-1. Please clarify.

18. Section 6.4 Quality Control Sample Requirements It is recommended that this section is reformatted to include the QA/QC samples, the frequency, the acceptance criteria and the corrective actions.

18. Section 6.4.1 Field Duplicate Samples Clarify whether or not a percent relative standard deviation will be calculated for the four samples (field duplicates and MS/MSD pair) and that acceptance criteria and corrective actions have been defined for the %RSD.

20. Section 6.4.3 Equipment Blanks Include the timing of equipment blank collection; indicate whether or not it will be collected at the start of each day, end of the day etc.

21. Section 6.4.4 Field Blanks It is recommended that the field blanks are of the same matrix as the field samples. Therefore they can be analyzed under the same conditions.

22. Section 6.4.4 Field Blanks. Define what is meant by "ambient conditions" in the last sentence.